

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

MARC OPPERMAN, RACHELLE KING,
CLAIRE MOSES, GENTRY HOFFMAN,
STEVE DEAN, ALICIA MEDLOCK, ALAN
BEUESHASSEN, SCOTT MEDLOCK, GREG
VARNER, JUDY LONG, GUILI BIONDI,
JASON GREEN and NIRALI
MANDAYWALA, for themselves and all
others similarly situated,

Plaintiffs,

vs.

PATH, INC., TWITTER, INC., APPLE, INC.,
FACEBOOK, INC., BELUGA, INC., YELP!
INC., BURBN, INC., INSTAGRAM, INC.,
FOURSQUARE LABS, INC., GOWALLA
INCORPORATED, FOODSPOTTING, INC.,
HIPSTER, INC., LINKEDIN
CORPORATION, ROVIO MOBILE OY,
ZEPTOLAB UK LIMITED AKA
ZEPTOLAB, CHILLINGO LTD.,
ELECTRONIC ARTS INC., and KIK
INTERACTIVE, INC.,

Defendants.

Civil Action No. 1:12-cv-00219-SS

CLASS ACTION

**DECLARATION OF JOSEPH WILSON IN SUPPORT OF MOTION TO
DISMISS, OR IN THE ALTERNATIVE TRANSFER**

Declaration of Joseph Wilson

I, Joseph Wilson, declare under penalty of perjury under the laws of the United States of America that the following is true and correct:

1. I am over the age of eighteen (18) years and make this Declaration based upon personal knowledge of the facts set forth below. If called upon to testify, I could and would testify competently as to the matters set forth herein.

2. I am a HR Director at Electronic Arts Inc. ("EA"). I have been employed in that capacity since September 7, 2010. I am currently employed in EA's offices at 5510 Lincoln Boulevard, Play Vista, CA 90094.

3. EA has 1489 employees at its corporate headquarters in California and a total of 2076 employees in California.

4. EA has offices in Austin, Texas, but none are involved with Chillingo or the Crystal network. Those employees instead are involved with (a) the development of the game *Star Wars: The Old Republic* and games made by our EA SPORTS label, (b) providing customer service for EA-branded titles, such as Dragon Age, Mass Effect, Battlefield, Need for Speed, Madden NFL, FIFA, The Sims, and Scrabble, (c) sales of EA-branded products, and (d) IT-related services and support, which includes several members of other EA teams such as Play4Free and marketing.

5. Chillingo does not have and has not had any employees or offices in the State of Texas.

6. No member of EA's senior corporate executive team is located in Texas.

7. EA acquired Chillingo in October, 2010.

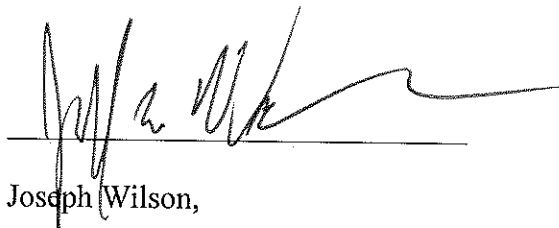
8. Chillingo is operated as a subsidiary of EA.

9. All EA employees responsible for the relationship between Chillingo and EA are located in the United Kingdom, California and Oregon.

10. EA's corporate records, as well as documentation regarding Chillingo and the Crystal social network under in EA's custody or under EA's control, are located in the United Kingdom and California.

11. All of EA's United States-based employees who are likely to have relevant information regarding the actions alleged in the complaint are based in California, or in states other than Texas.

Executed this 9th day of October, 2012:

A handwritten signature in black ink, appearing to read 'Joseph Wilson', is written over a horizontal line.

Joseph Wilson,
HR Director, Social & Mobile Publishing / All Play Studios

CERTIFICATE OF SERVICE

I hereby certify that on October 12, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record who have consented to electronic notification. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to all non-CM/ECF participants.

/s/ Michael H. Page

Michael H. Page